

EXHIBIT 25

DEFENDANTS' PROPOSED SPECIAL VERDICT FORM¹

You must consider each question of the Special Verdict Form and answer questions according to the instructions.

¹ The Defendants' Proposed Special Verdict Form utilizes the "clear and convincing" standard for questions of invalidity for the convenience of the Court. However, as discussed in Proposed Pretrial Order Exhibit 6, Defendants request that the Court either (1) instruct the jury that Defendants need only prove invalidity by a preponderance of the evidence with respect to those issues on which PTO has initially rejected the claims during reexamination, or (2) instruct the jury that it may consider the PTO's decision to declare re-examinations and initially reject the claims-in-suit when determining whether or not Defendants have rebutted the presumption of validity and proven invalidity by clear and convincing evidence.

As discussed in Exhibit 6, Defendants also request the Court consider providing special interrogatories regarding the factual inquiries underlying the legal question of obviousness.

JOINT ISSUES OF INVALIDITY

1. Considering each claim separately, has Symantec or ISS established by the clear and convincing standard that any of the following claims are invalid?

Please check the boxes that reflect your verdict.

If you find a claim "Invalid," you must then go on to check each reason you find the claim invalid. You may check more than one reason.

A finding of "Valid" is a finding for SRI. A finding of "Invalid" is a finding for Defendants (Symantec and ISS).

	INVALIDITY					
	VALID (FINDING FOR SRI)	INVALID (FINDING FOR SYMANTEC AND ISS)	ANTICIPATION	OBVIOUSNESS	BEST MODE	INADEQUATE DESCRIPTION
Patent No. 6,084,203						
Claim 1						
Claim 2						
Claim 4						
Claim 6						
Claim 12						
Claim 13						
Claim 15						
Claim 17						
Patent No. 6,711,615						
Claim 1						
Claim 2						
Claim 4						
Claim 13						
Claim 14						
Claim 16						
Patent No. 6,321,338						

	INVALIDITY					
	VALID (FINDING FOR SRI)	INVALID (FINDING FOR SYMANTEC AND ISS)	ANTICIPATION	OBVIOUSNESS	BEST MODE	INADEQUATE DESCRIPTION
Claim 1						
Claim 4						
Claim 5						
Claim 11						
Claim 12						
Claim 13						
Claim 24						

INFRINGEMENT BY SYMANTEC

2. Considering each claim separately, has SRI established by the preponderance of the evidence standard that Symantec infringed any of the following claims by using iForce IDS, ManHunt 3.0, Symantec Network Security 4.0, or the Symantec Network Security 7100 Series appliances (**the “ManHunt Products”**), or by knowingly inducing its customers to use one or more of the ManHunt Products to infringe the claim?

Please check the boxes that reflect your verdict.

A finding of “Not Infringed” is a finding for Symantec. A finding of “Infringed” is a finding for SRI.

	DIRECT INFRINGEMENT BY SYMANTEC		INDUCING INFRINGEMENT BY SYMANTEC’S CUSTOMERS	
	<u>NOT</u> <u>INFRINGED</u> (FINDING FOR SYMANTEC)	<u>INFRINGED</u> (FINDING FOR SRI)	<u>NOT</u> <u>INFRINGED</u> (FINDING FOR SYMANTEC)	<u>INFRINGED</u> (FINDING FOR SRI)
Patent No. 6,084,203				
Claim 1				
Claim 2				
Claim 4				
Claim 6				
Claim 12				
Claim 13				
Claim 15				
Claim 17				
Patent No. 6,711,615				
Claim 1				
Claim 2				
Claim 4				
Claim 13				
Claim 14				
Claim 16				

3. Considering each claim separately, has SRI established by the preponderance of the evidence standard that Symantec infringed any of the following claims by using Symantec Gateway Security 5400, 5600, or 1600 Series (**the “SGS Products”**) in combination with Incident Manager 3.0 or the Security Information Manager 9500 Series appliances (**the “Manager Products”**), or by knowingly inducing its customers to use one or more of the SGS Products in combination with one or more of the Manager Products to infringe the claim?

Please check the boxes that reflect your verdict.

A finding of “Not Infringed” is a finding for Symantec. A finding of “Infringed” is a finding for SRI.

	DIRECT INFRINGEMENT BY SYMANTEC		INDUCING INFRINGEMENT BY SYMANTEC’S CUSTOMERS	
	<u>NOT</u> <u>INFRINGED</u> (FINDING FOR SYMANTEC)	<u>INFRINGED</u> (FINDING FOR SRI)	<u>NOT</u> <u>INFRINGED</u> (FINDING FOR SYMANTEC)	<u>INFRINGED</u> (FINDING FOR SRI)
Patent No. 6,084,203				
Claim 1				
Claim 2				
Claim 4				
Claim 6				
Claim 12				
Claim 13				
Claim 15				
Claim 17				
Patent No. 6,711,615				
Claim 1				
Claim 2				
Claim 4				
Claim 13				
Claim 14				
Claim 16				

INFRINGEMENT BY ISS

4. Considering each claim separately, has SRI established by the preponderance of the evidence standard that ISS infringed any of the following claims through the operation of the RealSecure Agents (Network, Guard, Server, and Desktop series) and Proventia agents (A, G, M, Server and Desktop series) (**the “ISS sensors”**) used in combination with the SiteProtector SecurityFusion Module 2.0 (as well as later versions), or by knowingly inducing its customers to operate one or more of the ISS sensors used in combination with the SiteProtector Security Fusion Module 2.0 (as well as later versions) to infringe the claim?

Please check the boxes that reflect your verdict.

A finding of “Not Infringed” is a finding for ISS. A finding of “Infringed” is a finding for SRI.

	DIRECT INFRINGEMENT BY ISS		INDUCING INFRINGEMENT BY ISS’s CUSTOMERS	
	<u>NOT INFRINGED</u> (FINDING FOR ISS)	<u>INFRINGED</u> (FINDING FOR SRI)	<u>NOT INFRINGED</u> (FINDING FOR ISS)	<u>INFRINGED</u> (FINDING FOR SRI)
Patent No. 6,084,203				
Claim 1				
Claim 2				
Claim 4				
Claim 6				
Claim 12				
Claim 13				
Claim 15				
Claim 17				
Patent No. 6,711,615				
Claim 1				
Claim 2				
Claim 4				
Claim 13				
Claim 14				
Claim 16				

5. Considering each claim separately, has SRI established by the preponderance of the evidence standard that ISS infringed any of the following claims by using the Proventia Network Anomaly Detection System (ADS) product operating in standalone mode, or by knowingly inducing its customers to use the Proventia Network Anomaly Detection System (ADS) product operating in standalone mode to infringe the claim?

Please check the boxes that reflect your verdict.

A finding of “Not Infringed” is a finding for ISS. A finding of “Infringed” is a finding for SRI.

	DIRECT INFRINGEMENT BY ISS		INDUCING INFRINGEMENT BY ISS’S CUSTOMERS	
	<u>NOT</u> <u>INFRINGED</u> (FINDING FOR ISS)	<u>INFRINGED</u> (FINDING FOR SRI)	<u>NOT</u> <u>INFRINGED</u> (FINDING FOR ISS)	<u>INFRINGED</u> (FINDING FOR SRI)
Patent No. 6,321,338				
Claim 1				
Claim 4				
Claim 5				
Claim 11				
Claim 12				
Claim 13				
Claim 24				